

1 KENNETH C. JOHNSTON, ESQ.
2 Texas Bar No. 00792608
3 E-mail: kjohnston@krcl.com
4 BRIAN W. CLARK, ESQ.
5 Texas Bar No. 24032075
6 E-mail: bclark@krcl.com
7 DAVID M. CLEM, ESQ.
8 Texas Bar No. 24050428
E-mail: dclem@krcl.com
KANE RUSSELL COLEMAN & LOGAN PC
3700 Thanksgiving Tower
1601 Elm Street
Dallas, Texas 75201
Telephone: 214/777-4200
Facsimile: 214/777-4299

9 F. THOMAS EDWARDS, ESQ.
10 Nevada Bar No. 9549
11 E-mail: tedwards@nevadafirm.com
12 SARAH T. BASSETT, ESQ.
13 Nevada Bar No. 12326
14 E-mail: sbassett@nevadafirm.com
15 HOLLEY, DRIGGS, WALCH,
PUZEY & THOMPSON
16 400 South Fourth Street, Third Floor
Las Vegas, Nevada 89101
Telephone: 702/791-0308
Facsimile: 702/791-1912

17 *Attorneys for Plaintiff*
18 *Blue Acquisition Member, LLC*

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 BLUE ACQUISITION MEMBER, LLC,
22 Plaintiff,
v.
23 BAILEY PEAVY BAILEY, PLLC,
Defendant.

24 CASE NO. 2:14-cv-02013- GMN-NJK

25 **STIPULATION AND [PROPOSED]
26 ORDER EXTENDING TIME TO
RESPOND TO MOTION TO DISMISS,
TRANSFER OR STAY**

27 **(Second Request)**

28 Plaintiff Blue Acquisition Member, LLC (“Plaintiff”), by and through its undersigned
counsel, and Defendant Bailey Peavy Bailey, PLLC (“Defendant”), by and through its
undersigned counsel, hereby state as follows:

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1 1. On April 24, 2015, Defendant filed its Motion to Dismiss for Lack of Personal
 2 Jurisdiction or Alternatively Motion to Transfer Venue or Enter a Stay (Dkt. No. 32) (the
 3 “Motion”).

4 2. The response to the Motion was originally due May 11, 2015.

5 3. On May 8, 2015, the parties submitted a Stipulation and [Proposed] Order
 6 Extending Time to Respond to Motion to Dismiss, Transfer or Stay (First Request) (Dkt. No.
 7 33), requesting a one-week extension to allow Plaintiff to respond to the Motion based upon the
 8 trial schedule of counsel for Plaintiff, which the Court granted on May 18, 2015, (Dkt. No. 34).

9 4. Thereafter, the parties attempted to resolve the Motion by agreement but were
 10 unable to do so.

11 5. As a result of these negotiations, Plaintiff delayed the Opposition in the hope that
 12 the parties could consensually resolve the Motion. Because no agreement was reached, Plaintiff
 13 requested and Defendant agreed to another one-week extension to allow Plaintiff to respond to
 14 the Motion.

15 In light of the foregoing, the Parties stipulate and agree, subject to this Court’s approval,
 16 as follows:

17 1. That the time for Plaintiff to respond to the Motion shall be extended;

18 2. Plaintiff shall respond to the Motion by or before May 26, 2015.

19 Dated this 15th day of May, 2015.

20 HOLLEY, DRIGGS, WALCH, PUZEY
 & THOMPSON

PISANELLI BICE PLLC

22 By: /s/ F. Thomas Edwards
 23 F. Thomas Edwards, Esq., #9549
 Sarah T. Bassett, Esq., #12326
 400 South Fourth Street, Third Floor
 24 Las Vegas, Nevada 89101

25 *Attorneys for Plaintiff*

By: /s/ Jarrod L. Rickard
 26 James J. Pisanelli, Esq., #4027
 Jarrod L. Rickard, Esq., #10203
 400 South 7th Street, Suite 300
 27 Las Vegas, Nevada 89101

Attorneys for Defendant

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ORDER

IT IS SO ORDERED that the time for Plaintiff to respond to the Motion shall be extended to May 26, 2015. *[Signature]*

Gloria M. Navarro, Chief Judge
United States District Court

DATED: May 15, 2015

CASE NO. 2:14-cv-02013- GMN-NJK